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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

**JENI PEARSONS and MICHAEL
STORC,**

Plaintiffs,

v.

**UNITED STATES OF AMERICA;
Federal Bureau of Investigation
Special Agent LYNNE ZELLHART,
in her individual capacity; and DOES
1 through 5, Federal Bureau of
Investigation agents in their
individual capacities,**

Defendants.

Case No. 2:23-cv-07952-RGK-MAR

**DECLARATION OF KYNDRA
GRIFFIN IN SUPPORT OF
NOTICE OF ERRATA**

Judge: Hon. R. Gary Klausner
Complaint Filed: September 22, 2023

1 I, Kyndra Griffin, declare and state as follows:

2 1. I am employed as a paralegal by the Institute for Justice in Arlington,
3 Virginia.

4 2. I am currently the paralegal working on this case before Hon. R. Gary
5 Klausner, *Pearsons, et al. v. United States of America, et al.*, case no. 2:23-cv-
6 07952.

7 3. On October 16, 2023, I arranged with a California process server
8 company, Class Action Research, to provide personal service of the summons,
9 complaint, and other filings in this case (ECF No. 1 through ECF No. 31), on
10 Defendant FBI Special Agent Lynne Zellhart.

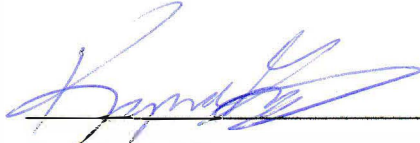
11 4. I provided the process server with the required documents in electronic
12 PDF format, and on October 20, 2023, the process server provided me with a
13 signed affidavit stating that they had completed personal service on an authorized
14 representative for Ms. Zellhart on October 17, 2023. That signed affidavit was
15 promptly filed with this Court. *See* ECF No. 35.

16 5. On November 6, 2023, Class Action Research notified me that they
17 had made an error with the documents they had served on Ms. Zellhart on October
18 17, 2023. A copy of the email chain containing that notification is attached as
19 Exhibit A. Class Action Research explained that they had inadvertently included
20 documents from a different case (No. 2:23-cv-07970) rather than the documents
21 from this case that I had provided to them. Ex. A at 3. As a result of that clerical
22 error, Ms. Zellhart had not yet received personal service of documents ECF No. 1
23 through ECF No. 31 from this case.

24 6. I instructed Class Action Research to re-serve Ms. Zellhart with the
25 correct documents. Ex. A at 2–3. The process server subsequently provided me with
26 a second signed affidavit stating they had served the correct documents the next
27 day, on November 7, 2023 (Ex. A at 1; ECF No. 36), and Plaintiffs filed that
28 second signed affidavit with the Court on November 9, 2023.

1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct.

3 Executed this 13th day of November, 2023.

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7 Kyndra Griffin
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